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9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12 Frescia Anthuane GARRO PINCHI,

13 Petitioner,

14 v.

15 POLLY KAISER, Acting Field Office Director  
of the San Francisco Immigration and Customs  
16 Enforcement Office; TODD LYONS, Acting  
Director of United States Immigration and  
17 Customs Enforcement; KRISTI NOEM,  
Secretary of the United States Department of  
18 Homeland Security, PAMELA BONDI,  
Attorney General of the United States, acting in  
19 their official capacities,

20 Respondents.  
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CASE NO. 25-cv-05632

**DECLARATION OF ARIEL KOREN**

1 I, Ariel Koren, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

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3 1. I have personal knowledge of the facts stated in this declaration and, if called as a  
4 witness, could testify truthfully to those facts. Where I do not have personal knowledge, I  
5 believe and am informed for the following information to be true.

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7 2. I am a close friend of Ms. Garro Pinchi, the petitioner in this case. In addition to  
8 having a close friendship with her, I have done an extensive amount of interpreting work for  
9 her and for her roommate Brayan Santiago Roperero Cano, in my capacity as an interpreter and  
10 Executive Director of the international NGO Respond Crisis Translation.

11 3. As a result of this interpreting work, I have extensive knowledge about the severe  
12 life-threatening harm that forced Ms. Garro Pinchi to flee her home country. I also have borne  
13 witness to the indispensable role she plays in sustaining her family as the sole provider for her  
14 mother, daughter, and relatives; the esteem and praise she has earned in her place of work in  
15 San Francisco; and the grave and extensive medical conditions that pose a threat to her life  
16 should she remain in confinement.

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18 4. On July 3, 2025 at 8:30 AM, I arrived at the San Francisco Immigration Court to  
19 accompany Ms. Garro Pinchi at her court hearing. As soon as her hearing began, the DHS  
20 attorney moved to dismiss her case. It has been my understanding that DHS is moving to  
21 dismiss cases like Ms. Garro Pinchi's, regardless of the strength of people's asylum claims, in  
22 order to take them out of immigration court jurisdiction and put them in a fast-track deportation  
23 process.

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25 5. Ms. Garro Pinchi looked back at me with visible terror in her eyes. I believe she  
26 shared my understanding that DHS's motion to dismiss signified an intent to deport her  
27 immediately. Ms. Garro Pinchi responded to the motion by pleading with the presiding judge  
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1 not to dismiss her case, stating that her life was at imminent risk should she be forced to return  
2 to her home country.

3 6. The judge responded by granting her a continuance to July 31, 2025 and  
4 instructing her to bring evidence to prove her case should not be dismissed.  
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6 7. The Judge also made a comment—that I understood to mean Ms. Garro Pinchi  
7 would likely be detained—along the lines of: “you are scheduled for July 31, 2025 but I might  
8 not be seeing you on that day or again in my court”.

9 8. DHS provided no reason for its motion to dismiss. The DHS attorney did not  
10 acknowledge Ms. Garro Pinchi’s plea that her life was under imminent threat.

11 9. After her hearing concluded, Ms. Garro Pinchi sat back down next to me. Ms.  
12 Garro Pinchi, who suffers from severe anxiety and PTSD, began to have shakes and heart  
13 palpitations. She was sweating profusely from her hands and head and her body was convulsing.  
14 She mentioned to me at this point that within a few hours she would need her medication, which  
15 was at her home.  
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17 10. Attempting to console her, I held her hand and we linked arms. When the judge  
18 stated that all were free to leave, we walked out of the court room to find four ICE officers, two  
19 of whom were masked, waiting outside of the door. Two officers aggressively physically  
20 separated us. I insisted that ICE had no reason to separate the two of us and that Ms. Garro  
21 Pinchi needed to leave for work and was planning to return for her court date on July 31, 2025.  
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23 11. The officers ignored me and forcefully pinned her against the wall, violently  
24 handcuffing her even though she was crying and was not resisting arrest.

25 12. The officers took her to a different floor in the building for processing. Shortly  
26 thereafter I arrived at that floor with my colleague Matthew Bridges. I insisted to the officers  
27 that Ms. Garro Pinchi now had an attorney representing her and that her attorney was on the  
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1 phone. I insisted that she had the right to consult with her attorney before being required to sign  
2 any documents.

3 13. After around an hour, Mr. Bridges and I were finally allowed visitation with Ms.  
4 Garro Pinchi through a glass window. At this point, her attorney had already filed a Habeas  
5 Corpus petition, as well as a request directly to ICE to release Ms. Garro Pinchi. In both filings,  
6 her attorney listed her dire health conditions, including a condition that requires her to take her  
7 medication every 8 hours, and emphasized that her medications were all at home.

9 14. Mr. Bridges and I repeatedly told every officer whom we encountered that a  
10 habeas corpus petition had been filed. Mr. Bridges even handed them a physical copy of the  
11 attorney's release request.

12 15. Additionally, we told every single officer whom we encountered that Ms. Garro  
13 Pinchi was facing acute medical risk as a result of her detention. I specified multiple times that  
14 she had been operated on twice in the past year alone, that she had recently undergone the  
15 removal of a vaginal tumor, and that she had severe breathing issues that would pose a risk to  
16 her life were she to be held in confinement without her medication.

17 16. I was also on the phone with Ms. Garro Pinchi's attorney during much of this  
18 time. I informed all of the ICE officers present that Ms. Garro Pinchi's attorney was on the  
19 phone and was insisting to speak to Ms. Garro Pinchi's deportation officer. In spite of this, all  
20 ICE officers present refused to speak to Ms. Garro Pinchi's attorney

21 17. At about 1:35 p.m., while Mr. Bridges and I were in the visitation room speaking  
22 to Ms. Garro Pinchi, an ICE officer opened the door and demanded that she come with him,  
23 pointing to handcuffs, which we understood to mean she would be restrained should she refuse.  
24 I insisted that we were in the middle of a consultation with her attorney via phone. She was  
25 taken away anyway.  
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1           18.     While she was absent from the visitation room, Mr. Bridges and I insisted that we  
2 needed to continue our conversation with her and that she needed to be allowed immediate  
3 access to her attorney. She remained absent, her whereabouts undisclosed to us, for over half an  
4 hour.

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6           19.     When she finally reappeared in the visitation room, she reported that she had just  
7 been forced by ICE to sign a document. She told us that the document was in English and was  
8 not translated to her, and that she had insisted to the officers that she did not want to sign  
9 anything without first consulting with an attorney.

10           20.     In addition to Mr. Bridges and my repeated requests to allow Ms. Garro Pinchi  
11 speak to her attorney, we had repeatedly told her that I was her Spanish-English interpreter. In  
12 spite of this, Ms. Garro Pinchi was forced to sign the document without speaking to her attorney  
13 and without having anyone to provide a translated version of this document.

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15           21.     In the visitation room, she reported to us that the ICE officer who had forced her  
16 to sign the document had told her that she had to sign off on one of two options: 1. Having the  
17 opportunity to pay a bond and speak with a judge or 2. Foregoing the opportunity to speak with  
18 a judge.

19           22.     As her interpreter, and having her attorney on the phone, I insisted that I be  
20 allowed to facilitate her attorney's review of the document she had been forced to sign and that  
21 her attorney have the chance to review it. I was never allowed to do so and still am not privy to  
22 the contents of the document that she signed.

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24           23.     After sharing that she had been forced to sign this document, Ms. Garro Pinchi  
25 also shared that she had been told she would likely be transferred to a detention facility. In  
26 response, I escalated my concerns by reiterating to the ICE officers present that:

27           a.     Her life would be at risk should she be transferred due to her dire medical issues;  
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- 1 b. She did not have her medication with her;
- 2 c. She had sufficient funds to pay an ICE bond;
- 3 d. The habeas corpus petition that had been filed meant that she should not be
- 4 transferred anywhere outside of the Northern District of California; and
- 5 e. Her release was urgent and life-critical for all of the aforementioned reasons.

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7 24. Despite my repeated protestations due to Ms. Garro Pinchi's medical condition,  
8 ICE officers entered the visitation room at 2:22 PM and forced her to leave with them under  
9 the threat of physical restraint.

10 25. Over the five-plus hours that I was in the ICE office, all officers with whom I  
11 spoke responded to my warnings about her critical medical condition by telling me I would  
12 need to speak to a different deportation officer. From roughly 10:30 AM until 3:40 PM, I  
13 remained present on the floor where Ms. Garro Pinchi was detained, requesting every 10-15  
14 minutes for the duration of the entire day to speak with the deportation officer about her  
15 medical condition, about the habeas corpus petition, and about the fact that her attorney was on  
16 the phone insisting to speak to someone. Each time I requested this, I was told that the  
17 deportation officer would speak with me, Mr. Bridges, and her attorney within 20 to 30  
18 minutes. However, at the end of each lapse of 20-30 minutes, we were told we would need to  
19 wait another 20-30 minutes.  
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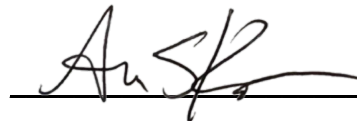
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22 26. Throughout the day, I was told countless times that I would be permitted to speak  
23 to an officer. At around 3:30 PM, I was told that business had closed and I should leave.

24 27. Since yesterday I have not been allowed any communication with Ms. Garro  
25 Pinchi and have been left in the dark as to her whereabouts. She has essentially been  
26 disappeared; I have no idea where she is being held and know only that she continues to be  
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1 detained without access to the medications and medical interventions that she relies on for her  
2 survival.

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5 I declare under penalty of perjury under the laws of the United States of America that the  
6 foregoing is true and correct.

7 Executed on July 4, 2025.

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10 Ariel Koren  
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